



<b>USDC SDNY</b>
<b>DOCUMENT</b>
<b>ELECTRONICALLY FILED</b>
<b>DOC #:</b> _____
<b>DATE FILED:</b> 10/8/2024

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
 NEW YORK, N.Y. 10007

**MURIEL GOODE-TRUFANT**  
*Acting Corporation Counsel*

**MARY JANE ANDERSON**  
*Assistant Corporation Counsel*  
 Tel.: (212) 356-2415  
 Fax: (212) 356-3509

October 8, 2024

**BY ECF**

Honorable Margaret M. Garnett  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

Re: Tyrel Escobar v. Ludington, et al., 22-CV-08434 (MMG)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to handle the defense of the above-referenced matter on behalf of defendants Ludington and Sheehan. In that capacity, I write with the consent of plaintiff's counsel, Stephanie Panousieris, Esq., to respectfully request an adjournment of the initial conference scheduled for October 16, 2024, at 11:00 a.m; and a corresponding extension of time to submit the joint letter, as well as a proposed Civil Case Management Plan and Scheduling Order which is required by Your Honor's Individual Rules to be submitted one week prior to the Initial Pretrial Conference. The reason for this request is that this matter was recently transferred to the undersigned. As such, I require additional time to familiarize myself with this case so that I can effectively participate at the initial conference. Should the Court grant defendants' request, the parties are available on November 7, 8, and 12, of 2024.

In view of the foregoing, it is respectfully requested that the Court grant the within request. Thank you for your time and consideration herein.

Respectfully submitted,

Mary Jane Anderson /s/  
 Mary Jane Anderson  
 Assistant Corporation Counsel  
 Special Federal Litigation Division

Cc: *Counsel of Record (BY ECF)*

Because Plaintiff consents to the request, the request is GRANTED. The deadline to file a joint letter and proposed Civil Case Management Plan is extended to **October 31, 2024**, and the Initial Pretrial Conference is adjourned to **Thursday, November 7, 2024, at 11:00 a.m.** The Clerk of Court is directed to terminate Dkt. No. 79.

SO ORDERED. Date 10/8/2024



HON. MARGARET M. GARNETT  
U.S. DISTRICT JUDGE